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KIRKLAND & ELLIS LLP

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P. 02

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**NGC NETWORK ASIA, LLC,**

**Plaintiff,**

**vs.**

**PAC PACIFIC GROUP INT'L, INC. OF  
USA,**

**Defendant.**

**CASE NO. 1:07-CV-2855 (PAC)**

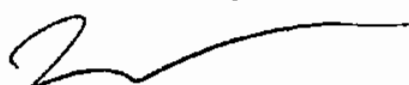
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DATE FILED: APR 18 2007**

**STIPULATION AND PROPOSED ORDER**

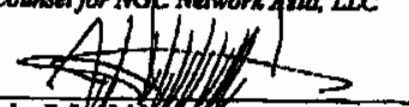
It is hereby stipulated and agreed that Defendant may have up to and including June 15, 2007 within which to answer the petition or to file such other pleadings, motions or objections as Defendant may, by its counsel, be advised.

It is further stipulated and agreed that Plaintiff may have up to and include June 30, 2007 to move to remand this matter.

Dated: April 14, 2007  
New York, New York

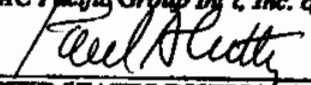
  
Matthew Solum (MS 1616)  
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Counsel for NGC Network Asia, LLC

Dated: April 14, 2007  
New York, New York

  
John F. L. Hebb  
Law Offices of John F. L. Hebb  
Law Offices of Robert H. Powsner  
Law Offices of Avrum J. Rosen  
Counsel for PAC Pacific Group Int'l, Inc. of USA

**SO ORDERED:**

**APR 18 2007**

By:   
UNITED STATES DISTRICT JUDGE